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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 11 2022

SEAN F. MCAVOY, CLERK
DEPUTY
YAKIMA, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JUAN CARLOS HERNANDEZ,

15 Defendant.

1:22-CR-2009-SAB

INDICTMENT

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), 846
Conspiracy to Distribute 500
Grams or More of a Mixture or
Substance Containing a
Detectable Amount of
Methamphetamine, Heroin,
and Fentanyl

21 U.S.C. § 853
Forfeiture Allegation

21 The Grand Jury charges:

22 On a date unknown, but by on or about February 2021, and continuing to on
23 or about January 11, 2022, in the Eastern District of Washington and elsewhere,
24 the Defendant, JUAN CARLOS HERNANDEZ, and other individuals, both
25 known and unknown to the Grand Jury, did knowingly and intentionally combine,
26
27
28 conspire, confederate and agree together with each other to commit the following

1 offense: distribution of 500 grams or more of methamphetamine, a Schedule II
2 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii); a
3 mixture or substance containing a detectable amount of heroin, a Schedule I
4 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C); and a
5 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-
6 phenylethyl)-4-piperidiny] propanamide (a/k/a Fentanyl), a Schedule II controlled
7 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C); all in violation of 21
8 U.S.C. § 846.

12 NOTICE OF CRIMINAL FORFEITURE

13
14 The allegations contained in this Indictment are hereby re-alleged and
15 incorporated by reference for the purpose of alleging forfeitures.

16
17 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of
18 21 U.S.C. §§ 841(a)(1), 846, as set forth in this Indictment, the Defendant, JUAN
19 CARLOS HERNANDEZ, shall forfeit to the United States of America, any property
20 constituting, or derived from, any proceeds obtained, directly or indirectly, as the result
21 of such offense and any property used or intended to be used, in any manner or part, to
22 commit or to facilitate the commission of the offense.
23

24
25 If any forfeitable property, as a result of any act or omission of the Defendant:

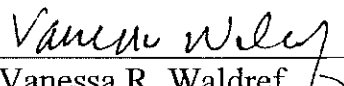
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27 a. cannot be located upon the exercise of due diligence;
28 b. has been transferred or sold to, or deposited with, a third party;
c. has been placed beyond the jurisdiction of the court;


1 d. has been substantially diminished in value; or
2 e. has been commingled with other property which cannot be divided
3 without difficulty,
4 the United States of America shall be entitled to forfeiture of substitute property
5 pursuant to 21 U.S.C. § 853(p).
6

7 DATED this 11th day of January, 2022.

8
9 A TRUE BILL.

10
11 foreperson
12

13 
14 Vanessa R. Waldref
15 United States Attorney

16 
17 Caitlin Baunsgard
18 Assistant United States Attorney
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